



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I-NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

URGENT MATTER – PROMPT REPLY NECESSARY
CERTIFIED MAIL – RETURN RECEIPT REQUESTED

MAR 20 2014

Mike McLaughlin, Facilities Manager
Ashaway Line & Twine Manufacturing Co.
24 Laurel Street
Hopkinton, RI 02804

Re: **NOTICE OF VIOLATION** of the applicable Generators Standards of Hazardous Waste, Section 3002 of the Resource Conservation and Recovery Act of 1976 (RCRA) and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6622(a) and 6924(d) through (m) and the State of Rhode Island and Providence Plantations Rules and Regulations for Hazardous Waste Management.

Dear Mr. McLaughlin:

On December 5, 2013, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Ashaway Line & Twine Mfg. Co (Ashaway), EPA ID No. RID001199355, with State of Rhode Island and Providence Plantations Rules and Regulations for Hazardous Waste Management (Rhode Island Rules) and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Rhode Island has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of the Rhode Island Rules and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The specific violations are set forth below:

1. **Failure to adequately label containers of hazardous waste with the words "hazardous waste" and the hazardous waste(s) identified in words, as required by RI Rule 5.4**

Specifically, the following containers of hazardous waste, located in the Dye House, were not labeled with the hazardous waste(s) identified in words that identify the contents of the container, in accordance with RI Rule 5.4:

One 1,000-gallon hazardous waste tank (Hazardous Waste Tank 1), holding waste sodium dichromate solution. The hazardous waste label was faded;

One 10-gallon red step can, containing rags. The hazardous waste label was damaged and the contents were not included on the label.

You are hereby required to:

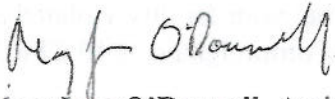
1. Immediately upon receipt of this **NOTICE**:
 - a. Label all containers of hazardous waste with the words "hazardous waste" and the hazardous waste(s) identified in words, as required by RI Rule 5.4.
2. Within (30) thirty calendar days of receipt of this **NOTICE**:
 - a. Submit a written description, with supporting documentation, of the actions taken to correct the aforementioned violations to:

Linda Brolin, Environmental Engineer
U.S. Environmental Protection Agency
5 Post Office Square, Suite 1100
Mail Code: OES05-1
Boston, MA 02109

Failure to correct the violation as required by this **NOTICE** may subject the facility to further federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA 42, U.S.C. § 6928.

If you have any questions regarding this **NOTICE**, please contact Linda Brolin, at (617) 918-1876.

Sincerely,



Mary Jane O'Donnell, Acting Manager
RCRA, EPCRA, and Federal Programs Unit

cc: Tracey Tyrell, RIDEM